Colt Industries

SEMS-RM DOCID # 1190117

Trent Tube Division
Crucible Inc
P. O. Box 3068
2100 East Orangethorpe
Fullerton, California 92634
714/526-5522

3737 Main St
Suite 500
Riverside CA 92501

April 1, 1984

Regional Water Quality Control Board
Santa Ana Region
6809 Indiana Avenue, Suite 200
Riverside, California 92506

Attention: James Anderson, Executive Officer

Reference: Facility Closure - CAD 008325110

Gentlemen:

In accordance with provisions of our interim status document number CAD 008325110 effective April 6, 1981, the Trent Tube Division hereby formally submits notification of its intent to close its manufacturing facility at 2100 East Orangethorpe Avenue, Fullerton, California, 92634, and hereby transmits for the record, a copy of our latest revised closure plan for the subject facility as required by Section V paragraph 2 (c) of that document.

In accordance with Section 1 (d) of the referenced interim status document, the owner notified the California State Department of Health Services of the proposed closure of the facility by certified letter on August 26, 1983, a copy of which is attached for reference.

The company plans to discontinue manufacturing operations at the subject facility on Friday, May 11, 1984, and to proceed at that time with the schedule of activities contained in the attached closure plan.

In accordance with discussions on March 29, 1984, between myself and consultant Mr. Klippel of Calocerinos & Spina, and Mr. Berchtold of your staff, we look forward to the expeditious review offered by your agency and trust that you will promptly advise us of any deficiencies noted in the closure document. Enclosed per Mr. Berchtolds' request is a copy of the Facilities Operating Plan as submitted to the Department of Health Services on August 26, 1984.

Thank you for your assistance in this matter and please do not hesitate to call if you have any questions or need additional information.

Very truly yours,

Robert M. McCoy

Trent Tube Division
Crucible Materials Corp.

cc: Dept. of Health Services
Hazardous Waste Management Board

T TUBE DIVISION - COLT INDUSTRIES
LERTON, CALIFORNIA

CLOSURE PLAN AND COST ESTIMATES FOR HAZARDOUS WASTE FACILITIES

FACILITY: Trent Tube Division, Fullerton Operation
2100 East Orangethorpe Avenue
Orange County
Fullerton, California 92634

OPERATOR: Trent Tube Division
Crucible Materials Corporation
P.O. Box 3068
Fullerton, California 92634

FACILITY ID NO.: CAD 008325110

FACILITY PHONE NO.: (714) 526-5522

I. GENERAL

A. This plan is prepared in compliance with the California Department of Health Services, Interim Status Document for the Fullerton facility, Section V, dated April 6, 1981.

B. This plan is to be submitted for approval to the California Regional Water Quality Board (CRWQB) prior to closure.

The local board is located at:

6809 Indiana Street
Suite 200
Riverside, California

Attention: Mr. James Anderson
Executive Officer
714/684-9330

II. WASTE INVENTORY

A. Pickle Liquor - EPA Number K062

(1) Contained in two process tanks of 2000 gallons each. Maximum volume at closure, 4000 gallons total.

(2) Waste is neutralized prior to disposal.

B. 1,1,1 Trichloroethane Waste - EPA Number F001

(1) Waste is contained in 55 gallon drums. Maximum storage capacity is 15 drums.

(2) Solvent used during manufacturing is contained in a degreaser unit having a maximum capacity of 2400 gallons.

C. Waste Mineral Spirits & Kerosene

(1) Contained in 55 gallon drums.

(2) Storage capacity at closure is 8 drums.

D. Waste Oil - EPA Number NA

(1) Contained in 10/20 gallon reservoirs at each of six draw benches.

(2) Maximum storage capacity is 200 gallons bulk waste plus the reservoir at each draw bench.

E. Dilute Detergent Cleaning Wastes - EPA Number NA

(1) Contained in a steel storage tank 200 gallons maximum capacity.

III. FACILITY DECONTAMINATION STEPS

A. Pickle Liquor Facilities

(1) Neutralize pickling acids with ammonia as per operating plan.
(2) Pump neutralized solutions to bulk tank truck.
(3) Manifest solutions for treatment and disposal.
(4) Dismantle and cut up nitric-HF pickle tank and exhaust intakes inside building.
(5) Manifest contaminated equipment for disposal.
(6) Arrange with supplier to remove ammonia storage tanks and vent ammonia feed system.

B. 1,1,1 Trichloroethane Facilities

(1) Arrange with reclaimer to pump out degreasing tank, recovery still equipment and 55 gallon drums of still bottoms.

(2) Arrange with reclaimer to haul off remaining quantities of virgin solvent in outside storage tanks.

(3) Rinse degreasing tank and recovery still system with detergent and water pump detergent solution to bulk tank truck for disposal.
(4) Manifest solvent and cleaning solution for disposal.
(5) Arrange with vendor for removal of vertical storage tank.
(6) Clean and ventilate remaining horizontal storage tank.

C. Mineral Spirit and Kerosene Facilities

(1) Arrange with reclaimer to pump out 55 gallon drums.
(2) Clean impound areas with detergent solution.
(3) Transfer cleaning solution to the 200 gallon storage tank.
(4) Manifest mineral spirits and kerosene for disposal by recycling.

D. Waste Oil Facilities

(1) Transfer oil from draw bench reservoirs to 200 gallon storage tank.
(2) Rinse draw bench reservoirs and pump system with detergent solution.
(3) Transfer detergent solution to storage tank.
(4) Arrange for disposal of waste oil from 200 gallon storage tank.
(5) Rinse out 200 gallon storage tank with detergent.
(6) Rinse out oily waste impound area with detergent.

E. Detergent Cleaner Solution Disposal

(1) Pump out 200 gallon storage tanks (2) and impound area into tank truck.
(2) Manifest cleaning solutions for proper disposal.

F. Empty Drum Disposal

(1) Arrange for drum reprocessor to pick up reusable drums.
(2) Crush unusable drums and manifest for disposal.

IV. CLOSURE SCHEDULE

A. After suspension of manufacturing operations, additional wastes due to clean-up operations, etc. will be generated for a maximum of thirty (30) days.

B. Upon suspension of manufacturing operations, all wastes will be treated within forty (40) days and removed from the premises within sixty (60) days.

V. COST ESTIMATES FOR FACILITY CLOSURE

A.	Pickle Liquor and Facilities	
	(1) Labor costs for neutralization of acids and cleaning and removal of tank and exhaust system. 60 hours @ $18/hr.	$1060
	(2) Transportation, treatment, and disposal of 4000 gallons of neutralized pickle liquor. (4000 gal.) X (8.34 #/gal.) X (125/ton) ÷ (2000 #/gal.)	2085
	(3) Transportation and disposal of pickle tank and exhaust system.	1200
	Subtotal	$4365
B.	1,1,1 Trichloroethane Facilities	
	(1) Labor costs for cleaning tanks. 24 hours @ $18/gal.	432
	(2) Credit for recovered solvent. 2000 gal. @ $.60/gal.	(1200)
	(3) Disposal of detergent rinse solution.	400
	Subtotal - Credit	($368)
C.	Mineral Spirits and Kerosene Facilities	
	(1) Credit for solvent recoveries.	($125)
	Subtotal - Credit	($125)
D.	Waste Oil Facilities	
	(1) Labor to transfer oil from draw benches to waste oil tank, clean oil reservoirs, storage tank and impound area. 24 hours @ $18/hr.	$432
	(2) Transportation and disposal of waste oil.	400
	Subtotal	$832
E.	Detergent Cleaning Solution Disposal	
	(1) Transportation and disposal.	$400
	Subtotal	$400

F.	Empty Drum Disposal	
	(1) Cleaning of reusable drums by drum processor. $10 each X 20 drums	$200
	(2) Crushing and disposal of non-reusable drums. $15 X 15 drums	225
	Subtotal	$425
G.	Administration Consultant Services & Contingencies	
	(1) Administration and supervision	$3000
	(2) Professional engineer recommendations, inspection and certification.	5000
	(3) Contingencies	2000
	Subtotal	$10,000
H.	Total Estimated Closure Cost - 4/2/84	$15,529

April 4, 1984
Date

Harry L. Murphy
Harry L. Murphy
Plant Manager